

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

DONALD J. TRUMP,

Plaintiff,

v.

MICHAEL D. COHEN,

Defendant.

Case No. 23-cv-21377-DPG

**MOTION FOR ALEXANDER NOCKS TO APPEAR
PRO HAC VICE, CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Alexander Nocks of E. Danya Perry PLLC d/b/a Perry Law, located at 157 East 86th Street, 4th Floor, New York, NY 10028, (646) 974-0935, anocks@danyaperryllaw.com, for purposes of appearance as co-counsel on behalf of Defendant Michael D. Cohen in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Alexander Nocks to receive electronic filings in this case.

In support of this Motion, the undersigned states as follows:

1. Alexander Nocks is not admitted to practice in the Southern District of Florida and is a member in good standing of the bar for the State of New York.¹

¹ Mr. Nocks was recently approved for admission to the bar for the State of Florida and anticipates being sworn in next week. Once he receives his Florida bar number, he plans to also seek admission to practice before the Southern District of Florida but, as of today, he is not yet eligible to appear

2. Movant, Lilian M. Timmermann, Esquire, of the law firm of Perry Law, 700 S. Rosemary St., Suite 204 West Palm Beach, FL 33401, is a member in good standing of the Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system.

3. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

4. In accordance with the local rules of this Court, Alexander Nocks has made payment of this Court's \$200 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

5. Alexander Nocks, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Alexander Nocks at email address: anocks@danyaperrylaw.com.

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before the Southern District of Florida absent permission to appear *pro hac vice*.

WHEREFORE, Lilian M. Timmermann moves this Court to enter an Order permitting Alexander Nocks to appear before this Court on behalf of Defendant for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Alexander Nocks.

Dated: September 28, 2023

Respectfully submitted,

By: Lilian M. Timmermann

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Counsel for Defendant Michael D. Cohen

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this September 28, 2023, a copy of this filing was submitted electronically via the CM/ECF system to all parties that have entered an appearance in this case and on the Court's electronic system.

By: /s/ Lilian M. Timmermann
Lilian M. Timmermann, Esq.